1 2 3 4 5 6 7 8 9 10 11 12 13	Robert J. Giuffra, Jr. (admitted pro hac vice) giuffrar@sullcrom.com Sharon L. Nelles (admitted pro hac vice) nelless@sullcrom.com William B. Monahan (admitted pro hac vice) monahanw@sullcrom.com John G. McCarthy (admitted pro hac vice) mccarthyj@sullcrom.com SULLIVAN & CROMWELL LLP 125 Broad Street New York, New York 10004 Telephone: (212) 558-4000 Facsimile: (212) 558-3588 Michael H. Steinberg (SBN 134179) steinbergm@sullcrom.com SULLIVAN & CROMWELL LLP 1888 Century Park East Los Angeles, California 90067 Telephone: (310) 712-6600 Facsimile: (310) 712-8800 Attorneys for Defendants Volkswagen AG and	
14	Volkswagen Group of America, Inc.	
15		
16	UNITED STATES DISTRICT COURT	
17 18	NORTHERN DISTRICT OF CALIFORNIA	
19		
20	IN RE: VOLKSWAGEN "CLEAN DIESEL")
21	MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION) MDL No. 2672 CRB (JSC)
22))) IDDODOSEDI ODDED CD ANTING
23	This Document Relates to:) [PROPOSED] ORDER GRANTING) DEFENDANTS' MOTION TO DISQUALIFY) PLAINTIESS: EXPEDIT LOUIS LEDGEH
24	ACTIONS SET FOR) PLAINTIFFS' EXPERT LOUIS J. FREEH) AND EXCLUDE HIS PROPOSED
25	FEBRUARY 18, 2020 TRIAL) TESTIMONY AT TRIAL)
26) The Honorable Charles R. Breyer)
27		
28		

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1	Having considered Defendants' Motion to Disqualify Plaintiffs' Expert Louis J. Freeh and	
2	Exclude His Proposed Testimony at Trial (hereinafter "Motion"), and for good cause appearing, IT IS	
3	HEREBY ORDERED THAT Defendants' Motion is GRANTED .	
4	Mr. Freeh is hereby disqualified from serving as Plaintiffs' expert and Plaintiffs may not	
5	introduce testimony from Mr. Freeh at trial.	
6		
7	IT IS SO ORDERED.	
8		
9	Dated:, 2020	
10	Honorable Charles R. Breyer UNITED STATES DISTRICT JUDGE	
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[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION TO DISQUALIFY AND EXCLUDE LOUIS J. FREEH MDL NO. 2672 CRB (JSC)